

**STATEMENT OF THE
NATIONAL BUSINESS AVIATION ASSOCIATION**

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VICE PRESIDENT – SAFETY, SECURITY
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**BEFORE THE
COMMITTEE ON HOMELAND SECURITY
SUBCOMMITTEE ON TRANSPORTATION SECURITY**

U.S. HOUSE OF REPRESENTATIVES

**“A Decade After 9/11 Could American Flight
Schools Still Unknowingly Be Training Terrorists?”**

JULY 18, 2012

Chairman Rogers, Ranking Member Jackson Lee, members of the Subcommittee, on behalf of the more than 9,000 members of the National Business Aviation Association (NBAA), we appreciate this opportunity to provide our views at this important hearing on general aviation security and American flight schools.

I am Doug Carr and I serve as vice president for safety, security and regulation at the National Business Aviation Association based here in Washington, DC. NBAA represents over 9000 diverse companies with one thing in common—they all depend on general aviation aircraft for the conduct of their business. In this position, I have worked with the Transportation Security Administration (TSA) since its first days as a government agency and have served in several advisory capacities, which include currently serving as co-chairman of the Aviation Security Advisory Committee (ASAC) General Aviation Subgroup.

The general aviation community is committed to the security of our national transportation system. We continue to seek productive ways to partner with the federal government on developing reasonable, workable and effective regulations that simultaneously ensure security and facilitate general aviation operations. This includes the TSA's Alien Flight Student Program (AFSP).

FACTS ABOUT BUSINESS AVIATION

From creating growth opportunities and global connectivity for America's small towns and rural areas to supporting the nation's productivity, business aviation is an important economic engine, creating jobs and investment, while contributing to the world's leading aviation system. Business aviation is absolutely essential as U.S. companies work to compete in a global marketplace. Simply put, business aviation is a vital part of the nation's economy and transportation system.

Business aviation is defined by the FAA as the use of any general aviation aircraft (piston or turbine) for a business purpose. NBAA was founded 67 years ago to represent companies that utilize general aviation aircraft as a tool for meeting some of their transportation challenges. While NBAA member companies purchase billions of dollars per year in commercial airline tickets, there are critical situations where the use of a general aviation aircraft is indispensable. For U.S. companies to be successful in these challenging economic times, every business tool must be available – including general aviation aircraft.

General aviation is an essential economic generator, contributing more than \$150 billion to annual U.S. economic output, and employing more

than one million people. Most general aviation aircraft operating around the world are manufactured and/or completed in the U.S., and our industry is continuing to build a strong American manufacturing and employment base that contributes positively to our national balance of trade.

General aviation includes diverse operations, with business uses that range from agriculture, to law enforcement, to fire and rescue services, to varied government, educational, nonprofit organizations and businesses of all sizes. Servicing and supporting these organizations are FBO's, maintenance technicians, suppliers and service providers.

Business aviation is not only an economic lifeline for thousands of our nation's smaller communities; it also supports people and communities in times of crisis in the U.S. and around the world.

General aviation has snapped into action when there's a need to confront floods in the Midwest, fires in the West, or a whole host of other natural disasters. The business aviation community – working mostly on a volunteer basis – has always been quick to help assess damage, rescue those affected by these disasters, and carry in lifesaving support and supplies to the affected regions.

In addition, hundreds of GA operators carried thousands of passengers and over a million pounds of supplies to and from Haiti after the devastating earthquake there. In fact, Congress passed a resolution commending general aviation for its response to the crisis.

The people who rely on a general aviation aircraft for business are also dedicated to helping provide lifesaving flights to the communities in which they live and work. Operations like the Corporate Angel Network arrange free air transportation for cancer patients traveling to treatment using the empty seats aboard business airplanes. Angel Flight America's seven member organizations and 7,200 volunteer pilots arrange flights to carry patients to medical facilities.

The Veterans Airlift Command uses business airplanes and unused hours of fractional aircraft ownership programs to provide free flights for medical and other purposes for wounded service members, veterans and their families. Veterans Airlift finds volunteers in the business aviation community to fly missions on request and contribute the full cost of their aircraft and fuel for the missions flown.

ECONOMIC CHALLENGES FACING BUSINESS AVIATION

Unfortunately, the people and businesses in general aviation, like other industries, are weathering one of the worst economic storms anyone has ever seen. The impact of the flagging economy on the companies and communities that rely on general aviation is visible in all parts of the country.

Over the past few years, we saw business aviation flying decrease by as much as 35 percent in some locations – which unfortunately led to thousands of layoffs across the industry and country. While we have seen some uptick in flight activity in recent months, activity is still below the 2008 levels and experts agree that the recovery will be slow and gradual over the next several years.

TSA's ALIEN FLIGHT STUDENT PROGRAM (AFSP)

Since the events of 9/11, NBAA and indeed the entire the general aviation community has been very proactive in enhancing security by developing and implementing a large number of workable and effective security measures.

The general aviation community has worked closely with several government agencies including the Department of Homeland Security (DHS) and the Transportation Security Administration (TSA) and this partnership approach has produced tangible results. The security measures we have implemented include the creation of a toll-free general aviation security reporting hotline for any suspicious activity at an airport, the monitoring of aircraft financing transactions, a new requirement for government-issued, tamper-proof photo-IDs for pilots, and guidelines for security at general aviation airports and an AOPA Airport Watch program. In addition, eight years ago, NBAA members in the NY area voluntarily initiated a pilot program to design a security program specifically for operations in that area.

The Alien Flight School Program (AFSP) represents one of TSA's programs that affect many people beyond our borders. The goal of the program, we believe, is vital in protecting our national security. While the program initially created a substantial burden for foreign citizens seeking flight training in the United States, recent program changes and continued feedback from the flight training industry have produced improvements not only in the program, but also for foreign flight training candidates.

It is important that we note the improvements made in the Alien Flight School Program since its inception. When the program began, it was common for a flight training candidate to come to the US for processing, only

to then wait an additional 30-45 days for a review and approval to then begin training. These days, processing takes only a few days and does not require the candidate to come to the US in advance. The improvements made to the clearance process have reduced the uncertainty of securing a clearance while improving the flight school's ability to schedule classroom, simulator and aircraft training.

These improvements resulted from ongoing and collaborative feedback from the flight training industry and is an example of how we can work together to overcome challenges. NBAA looks forward to partnering with DHS and TSA in working to address concerns raised by the recent GAO report. This hearing today will be extremely beneficial in this effort.

We continue to work with the TSA on other areas of the AFSP that need improvement. These include:

- **Assigning a security clearance to an individual, not a training event.** Currently, a flight school must submit an individual for clearance for every training event he or she attends, regardless of how many training visits this entails. We believe that one candidate-centric review should suffice for a defined period of time, perhaps 5 years, regardless of the number of training events.
- **Improving regulatory guidance.** Flight schools still face a wide variety of interpretation regarding various, sometimes basic elements of the program. More standardized guidance to flight schools about the program would assist with compliance and oversight.
- **Dry leasing of simulators.** Current guidance requires both the simulator owner and simulator lessor to submit candidates for clearance. This seems duplicative and does not appear to enhance security. Updating TSA's guidance on who should submit names for clearance would greatly reduce the burden on both the government and the industry in the clearance process.

We strongly believe that the U.S. flight training industry is the best in the world. Students leave U.S. flight schools very well prepared to deal with the challenges of private and commercial flying regimes throughout the world. Thousands of jobs in the United States are supported directly from the flight training industry and our policies and regulations should not only ensure that flight candidates do not represent a security threat to our nation, but also continue to appropriately support the U.S. as the preeminent flight training location in the world.

Mr. Chairman, Ranking Member Jackson Lee and members of the subcommittee, the general aviation community is grateful for the tremendous leadership this committee has provided as we collectively work to address these vital homeland security issues.

We would like also to note the efforts of this committee to support the inclusion of the GA community in the TSA ASAC process--including most recently in Ranking Member Thompson's "Aviation Security Stakeholder Participation Act" (HR 1477)--which passed the House on June 28. On behalf of NBAA, I would like to reiterate our appreciation to the Committee for your continued support for general aviation.

Thank you.